REMARKS

This is in response to the Office Action dated June 2, 2005. Claims 8-18, 25-40, 46 and 48-52 are pending.

The claims stand objected to in section and rejected under Section 112, first paragraph, in section 5 of the Office Action. The brackets added in the last amendment have been deleted. Thus, this objection/rejection has been addressed and overcome. There is no new matter in the specification.

Furthermore, a *Rule 132 Declaration is attached hereto.* The Rule 132 declaration discusses the equation at the bottom of page 17 in the specification as originally filed. In particular, the equation:

$$d = \lambda / (2 \times n) \times m$$

The attached Rule 132 declaration states that to one of ordinary skill in the art, it is clear that "m" in this equation is in the numerator (not in the denominator). In other words, it is clear to one of ordinary skill in the art that to execute this equation one first determines $\lambda/(2 \times n)$ and then multiplies this result by m. This is further evidenced by the fact that in the equation the "m" is outside of the parenthesis, instead of inside. See the Rule 132 declaration attached hereto in this respect.

Claim 8 was previously rejected as being allegedly anticipated by Ohtani. Claim 8 clearly defines over Ohtani for at least the following reasons. Claim 8 requires that the thickness (d) of the supplementary capacitance insulating film be: $\underline{d = \lambda/(2 \times n) \times m}$. Ohtani fails to disclose or suggest this.

Ohtani in Fig. 1 discloses an LCD including ITO pixel electrode 108, ITO auxiliary capacitance electrode 104, and capacitance insulator 105. Ohtani at col. 4, line 67 teaches that

the thickness (d) of the capacitance insulator 105 should be defined by the following equation: $d = \lambda/(4 \times n)$.

In contrast with Ohtani, claim 8 requires that the thickness (d) of the supplementary capacitance insulating film be: $\underline{d = \lambda/(2 \times n) \times m}$. Ohtani fails to disclose or suggest this. Ohtani's aforesaid equation $[d = \lambda/(4 \times n)]$ is not equal to the equation required by claim 8. For example, consider a scenario where n=2. When n=2, the equation of claim 8 would be: $d = \lambda/4 \times m$. However, given the same exact scenario where n=2, the equation of Ohtani would be: $d = \lambda/8$. It can be seen that the result from Ohtani's equation is much different than the result of the equation required by claim 8. In particular, the equation required by claim 8 permits unexpectedly improved results as explained in the instant specification. Ohtani is entirely unrelated to the invention of claim 8 in this regard.

In paragraph 6, the October 19, 2004 Office Action contends that the equation of Ohtani "can be rewritten as $d = \lambda/(2 \times n) \times m$, wherein m=2" as required by claim 8. This allegation is incorrect (probably because the Examiner has incorrectly placed m in the denominator of the equation in claim 8). That Office Action incorrectly attempted to use "m" in the *denominator* of the equation, which clearly is not the case.

The Rule 132 declaration attached hereto clearly evidences that one of ordinary skill in the art would have understood that in the equation "m" is in the *numerator* (e.g., see pg. 17 of the specification, and the Rule 132 declaration attached hereto). If "m" is an integer as alleged in the Office Action, it is impossible for Ohtani's equation to be rewritten to meet that of claim 8 because m is in the numerator in the equation of claim 8 (in claim 8, only the parenthetical is in the denominator as will be appreciated by those of ordinary skill in the art – see the attached Rule 132 declaration). Moreover, the instant specification makes clear on pages 17+ in view of

the numbers plugged into the equation and the results, that "m" must be in the numerator. Still

further, the equation in the original specification makes clear that "m" must be in the numerator,

since if it was otherwise the parenthesis would not have been placed around "2 x n." The fact

that the parenthesis were placed around "2 x n" in the original specification and claims makes it

very clear that "m" is in the numerator, and not the denominator. Again, given that "m" is in the

numerator of the equation as evidenced by the Rule 132 declaration, the cited art cannot possibly

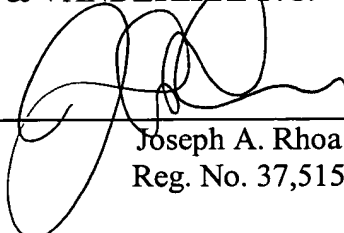meet the invention of claim 8.

Claims 15, 33, 46 and 49 define over the cited art in a similar manner, since the cited art

fails to disclose or suggest the claimed equation.

For at least the foregoing reasons, it is respectfully requested that all rejections be

withdrawn. All claims are in condition for allowance. If any minor matter remains to be

resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

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